

HILL, FARRER & BURRILL LLP

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Attorneys for Plaintiff/Counter-Defendant

CornerStone Staffing Solutions, Inc. and

Counter-Defendant Mary Anderson

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT—SAN FRANCISCO DIVISION

**CORNERSTONE STAFFING
SOLUTIONS, INC., a California
corporation,**

Plaintiff,

vs.

**LARRY THAXTER JAMES, an
individual; et al.,**

Defendants.

CASE NO. C12-01527 RS

ORDER

**STIPULATION TO EXTEND
DISCOVERY MOTION FILING
DEADLINE**

[Local Rule 37-3]

**Complaint Filed: March 27, 2012
Trial Date: February 10, 2014**

**AND RELATED
COUNTERCLAIMS**

HILL, FARRER & BURRILL LLP
A LIMITED LIABILITY PARTNERSHIP
ATTORNEYS AT LAW
ONE CALIFORNIA PLAZA, 37TH FLOOR
300 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071-3147

STIPULATION

The parties to this stipulation agree as follows:

(1) Local Rule 37-3 provides that discovery motions must be filed no later than 7 days after the discovery cut-off.

(2) Some of the parties have outstanding issues with each other's discovery responses and third-party subpoenas and are engaged in ongoing efforts to resolve them without the need for motion practice. A short extension of the discovery motion cut-off may result in the informal resolution of these issues.

(3) The parties agree to extend the fact discovery motion cut-off to December 20, 2013.

IT IS SO STIPULATED.

HILL, FARRER & BURRILL LLP

Dated: 11/25/13

Signed: 

CLAYTON HIX
Attorneys for CORNERSTONE
STAFFING SOLUTIONS, INC. and
Counter-Defendant MARY
ANDERSON

MARRON LAWYERS

Dated: 11/22/13

Signed: 

PAUL ARENAS
Attorneys for LARRY JAMES;
DAVID R. BATTON; BATTON
TECHNICAL ENGINEERING
CONSULTANTS, INC.; BATTON,
INC.; HANBON -- CARO I, LLC;
HANBON -- MI I, LLC; HANBON
MI II, INC.; HANBON --
MARLETTE, LLC; HANBON -- PA
I, LLC; TEC GROUP, INC.;
DEPLOY HR, INC.; DEPLOYHR,
INC.

WOODS LAW GROUP

Dated: 11/22/13

Signed: Briny Woods
BRINY WOODS
Attorneys for MICHAEL SANTOS
and HANBON - CT I, LLC

BURKHARDT & LARSON

Dated: _____

Signed: _____
PHILIP BURKHARDT
Attorneys for MARCOS BARRERA

WOOD, SMITH, HENNING & BERMAN,
LLP

Dated: _____

Signed: _____
SEYMOUR B. EVERETT
Attorneys for MARCOS BARRERA

CARLSON & MESSER LLP

Dated: _____

Signed: _____
CHARLES R. MESSER
Attorneys for LARRY JAMES;
DAVID R. BATTON; BATTON
TECHNICAL ENGINEERING
CONSULTANTS, INC.; HANBON
MI II, INC.; TEC GROUP, INC.;
DEPLOY HR, INC.; DEPLOYHR,
INC.

ERICKSEN ARBUTHNOT

Dated: _____

Signed: _____
MARK KEIFER
Attorneys for ANDRE DOUZDJIAN

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Dated: _____

WOODS LAW GROUP

Signed: _____
BRINY WOODS
Attorneys for MICHAEL SANTOS
and HANBON - CT I, LLC

Dated: 11-22-13

BURKHARDT & LARSON
Signed: 
PHILIP BURKHARDT
Attorneys for MARCOS BARRERA

Dated: _____

WOOD, SMITH, HENNING & BERMAN,
LLP

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Attorneys for MARCOS BARRERA

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Signed: _____
PHILIP BURKHARDT
Attorneys for MARCOS BARRERA

WOOD, SMITH, HENNING & BERMAN,
LLP

Dated: 11/22/13

Signed:  - for
SEYMOUR B. EVERETT
Attorneys for MARCOS BARRERA

CARLSON & MESSER LLP

Dated: _____

Signed: _____
CHARLES R. MESSER
Attorneys for LARRY JAMES;
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TECHNICAL ENGINEERING
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Attorneys for MARCOS BARRERA

CARLSON & MESSER LLP

Dated: 11/27/13

Signed: [Signature]
CHARLES R. MESSER
Attorneys for LARRY JAMES;
DAVID R. BATTON; BATTON
TECHNICAL ENGINEERING
CONSULTANTS, INC.; HANBON
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INC.

ERICKSEN ARBUTHNOT

Dated: 11-25-13

Signed:  _____
MARK KIEFER
Attorneys for ANDRE DOUZDJIAN

~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation of the Parties, the Court orders as follows:

The deadline to file fact discovery motions is extended to December 20, 2013.

IT IS SO ORDERED.

Date: 11/27/13



The Honorable Richard Seeborg
United States District Court

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